THE COMMONWEALTH OF MASSACHUSETTS

OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

ONE SOUTH STATION

BOSTON, MA 02110
(617) 305-3500

April 7, 2003

BY E-MAIL AND
FIRST CLASS U.S. MAIL

Robert J. Keegan, Esq.
Cheryl M. Kimball, Esq.
Keegan, Werlin, & Pabian, LLP
21 Custom House Street
Boston, MA 02110

Re: Boston Edison Company d/b/a NSTAR Electric , D.T.E. 03-13

Dear Mr. Keegan:

Enclosed is the First Set of Information Requests by the Department of Telecommunications and Energy to Boston Edison Company d/b/a NSTAR Electric regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., April 21, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 03-13

FIRST SET OF INFORMATION REQUESTS TO
BOSTON EDISON COMPANY d/b/a NSTAR ELECTRIC

The Department of Telecommunications and Energy ("Department") submits to Boston Edison Company d/b/a NSTAR Electric (“Company”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Company’s 2002 Service Quality (“SQ”) report filed on February 28, 2003 (“Filing”).

2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Provide electronic versions of all your responses including all calculations and worksheets. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later that April 21, 2003**.

3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term **“historical data”** refers to data for the years **1992 through 2001.**

5. The term “provide complete and detailed documentation” means:

   Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.

6. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit four (4) copies of the responses to Jody M. Stiefel, Hearing Officer, and (2) copies to Glenn Shippee, Rates and Revenue Requirements Division.

Requests

DTE 1-1 Please explain why ten years of historical data is not available for the following SQ penalty measures and reporting requirements: Service Appointments; Meters Read; Property Damage; Staffing Levels; and Accidents.

DTE 1-2 Please refer to Filing at §§ I-2, III-3. Provide additional information regarding the Company's Customer Guarantee program, explaining for what reason payouts were made and how the Company made the program known to employees and customers.

DTE 1-3 Please provide calculations for all offset amounts.

DTE 1-4 Please detail the internal audits that have been conducted to assure the accuracy of Company data. If internal audits have not been performed, indicate the Company's plans to perform such audits.

DTE 1-5 Please refer to the Company's Filing at §§ I-2, III-Appendix 12. Does the number of consumer division cases and billing adjustments include only residential customers? If not, please provide information for only residential customers.

DTE 1-6 Please explain how each of the following SQ measures were recorded and measured:

(a) Telephone Answer Factor;
(b) Emergency Answering;
(c) Service Appointments Kept;
(d) Meter Reads;
(e) Bill Adjustments;
(f) Lost Time Accident Rate;
(g) Response to Odor Calls;
(h) Restricted Work Day Rate.

In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.

DTE 1-7 For each of the SQ penalty measures, please detail the initiatives the Company has implemented during 2002 to improve its performance.

DTE 1-8 For each of the SQ penalty measures, please detail any conditions under which the Company operated during 2002 that may have influenced the results the Company achieved.